

**Date: February 3, 2006**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: EB-06-TC-060, EB Docket No. 06-36, Certification of CPNI Filing 2006**

Dear Ms. Dortch:

This letter serves as our "Certification of CPNI Filing 2006", as ordered in EB-06-TC-060.

**Company Name(s): Alliance Communications**

**Address: PO Box 349**

**City, State: Garretson, SD 57030**

As a corporate officer of these companies, I hereby certify that, based on my personal knowledge, the Companies have established operating procedures that are adequate to ensure compliance with the rules established by the Federal Communications Commission ("FCC") concerning Customer Proprietary Network Information ("CPNI"), as set forth in Part 64, Subpart U, of the FCC's Rules and Regulations, 47 C.F.R. § 64.2001 *et seq.*, as revised.

The attached Statement demonstrates such compliance.

Mark Bahnson  
Company Officer

Dated: February 3, 2006

Attachment

cc: Byron McCoy, Telecommunications Consumers Division, Enforcement  
Bureau, Federal Communications Commission, Room 4-A234, 445 12<sup>th</sup> Street,  
SW, Washington, DC 20554  
Best Copy and Printing, Inc., Portals II, 445 12<sup>th</sup> Street, SW, Washington, DC  
20554

Alliance Communications is submitting the CPNI Compliance Certificate in response to the Public Notice issued by the FCC on February 2, 2006 in DA 06-258, pursuant to Section 64.2009(e) of FCC rules.

### **CPNI Operating Procedures for Alliance Communications**

Alliance Communications may from time to time wish to inform customers of new, enhanced or beneficial features or services to customers. Information in the Alliance Communications database will be used in order to determine which customers Alliance Communications could be contacted. Before doing so, the customer must have granted Alliance Communications permission to use this information for marketing purposes. This information is legally referred to as Customer Proprietary Network Information or CPNI.

### **Customer Notification**

Annually, existing customers are notified via a bill insert that they have the right to restrict Alliance Communications' use of the customer's CPNI. (Alliance Communications last bill insert was distributed 10/1/05.) Within 30 days of the notification the customer must either call toll free 1-888-271-0717 or e-mail [cpni@alliancecom.net](mailto:cpni@alliancecom.net) to inform Alliance Communications that they wish to restrict the use of CPNI. If the customer does not contact Alliance Communications they will be granting Alliance Communications the right to use the information. The approval or denial will not affect any service and will remain valid until the customers either revokes or limits the approval or denial.

New customers are notified via an insert in the New Customer Packet that is mailed to every new customer when they begin service with Alliance Communications. This insert contains the same information as the bill insert. New customer CPNI may not be used until 60 days after the customer begins service with Alliance Communications to ensure ample time to respond if the customer wishes to restrict use. . (See Sample A for text of the Bill Insert and New Customer Packet Insert)

### **Alliance Communications Marketing with CPNI**

Only under the direction of the Alliance Communications Marketing Department may CPNI be used. Before using CPNI, the specific Marketing Plan must be approved by the Office Manager. The Marketing Department is responsible for maintaining and updating the customer database that has denied CPNI usage. A new customer database will be generated each time CPNI is used to ensure that only most current approved customers are contacted.

Upon completion of each marketing attempt, a sample of the communicated script, flyer, post card or however the sales information was presented to the customer using CPNI will be saved in a binder. Each attempt will also be documented. A description of what

products or services were presented in the attempt. What parameters were used to select the customers in the attempt, e.g. "Customers with Dial-up Internet without Voicemail"? This record will be saved for no less than a year.

Each year the Office Manager and the Marketing Department will review CPNI procedures and policies. The Office Manager and Marketing Department will review how CPNI rights are communicated to customers. The Office Manager and Marketing Department will also review the methods of communicating this information.

Any instance where the Alliance Communications CPNI procedures have not worked properly will be reported to the Office Manager immediately.

**Sample A (Bill Insert & New Customer Packet Insert)**

## **Important Notice Regarding Your Account**

Alliance Communications occasionally changes its service offerings and makes available additional features and services, which may enhance or improve the service to which you are already subscribed. In order for us to determine which customers may benefit from the new services and enhancements, we will use information about your account that is within our database, legally referred to as Customer Proprietary Network Information (CPNI), unless you restrict that use in the manner described below. CPNI includes information such as your long distance carrier, calling features and plans to which you are subscribed, and the associated charges for those plans, telephone numbers called and the length of telephone calls. Use of this data will allow Alliance Communications to tailor our service offerings to your individual needs.

For this purpose, CPNI data will be used only by Alliance Communications. Unless we are legally compelled to do so, this data will not be shared by Alliance Communications with any other outside source except as necessary to provide the service(s) to which you are already subscribed.

You have the right under federal law to protect the confidentiality of your account information and to restrict the use of CPNI data, and we have a responsibility to protect your data. To restrict the use of your CPNI data, you must call the business office at 1-888-271-0717 and leave a message or e-mail us at [cpni@alliancecom.net](mailto:cpni@alliancecom.net) within 30 days of your receipt of this notice and request that we not utilize your CPNI data. Your denial or approval for Alliance Communications to use this data will not affect the provision of any services to which you subscribe. Your approval, or denial of approval, for the use of CPNI outside the service to which you are already subscribed, will remain valid until you revoke or limit the approval or denial.